

Subject: Re: Andrews v. Tri Star Discovery
Date: Wednesday, February 9, 2022 at 1:26:05 PM Central Standard Time
From: Daniel Arciniegas
To: roland@mumfordlaw.net, Betsy Hart
CC: Tara Swafford
Attachments: image001[4].jpg, image002[50].jpg, image003.jpg

Betsy:

Let's move it to Friday at 1 if that works. I want to identify our disputes and see what we can narrow.

If there are any other non-confidential documents Defendant intends on producing please provide those. Seems like there should be more that falls outside the scope of your proposed protective order. The absence of documents I expected to produce by Defendant gives me concern of over-designation.

If you are asserting privilege for any documents related to RFI of non-essential WFH employees people, or another category of information called for in our discovery requests, please provide that as well.

I'm working on supplementing our discovery production, by the 10th as stated in your letter. I think we will have some but not all and I want to discuss our respective positions on the 11th.



Daniel Arciniegas

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From: roland@mumfordlaw.net <roland@mumfordlaw.net>
Date: Tuesday, February 8, 2022 at 1:46 PM
To: Betsy Hart <betsy@swaffordlawfirm.com>, Daniel Arciniegas <daniel@attorneydaniel.com>
Cc: Tara Swafford <tara@swaffordlawfirm.com>
Subject: Re: Andrews v. Tri Star Discovery

Works for me

Roland Mumford
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PERSONAL INJURY
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EDUCATION LAW
FAMILY LAW

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From: Betsy Hart <betsy@swaffordlawfirm.com>
Date: Tuesday, February 8, 2022 at 1:41 PM
To: roland@mumfordlaw.net <roland@mumfordlaw.net>, Daniel Arciniegas <daniel@attorneydaniel.com>
Cc: Tara Swafford <tara@swaffordlawfirm.com>
Subject: RE: Andrews v. Tri Star Discovery

Sure. How about 2pm?

Betsy Hart
The Swafford Law Firm, PLLC
615-599-8406 office
502-741-6831 cell

From: roland@mumfordlaw.net <roland@mumfordlaw.net>
Sent: Tuesday, February 8, 2022 1:13 PM
To: Betsy Hart <betsy@swaffordlawfirm.com>; Daniel Arciniegas <daniel@attorneydaniel.com>
Cc: Tara Swafford <tara@swaffordlawfirm.com>
Subject: Re: Andrews v. Tri Star Discovery

Can we schedule call in the afternoon. I have a court hearing in the morning

Roland Mumford
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From: Betsy Hart <betsy@swaffordlawfirm.com>
Date: Tuesday, February 8, 2022 at 1:11 PM
To: Daniel Arciniegas <daniel@attorneydaniel.com>
Cc: roland@mumfordlaw.net <roland@mumfordlaw.net>, Tara Swafford <tara@swaffordlawfirm.com>
Subject: RE: Andrews v. Tri Star Discovery

Yes – we are here tomorrow.

Betsy Hart
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From: Daniel Arciniegas <daniel@attorneydaniel.com>
Sent: Tuesday, February 8, 2022 11:53 AM
To: Betsy Hart <betsy@swaffordlawfirm.com>
Cc: Roland Mumford <roland@mumfordlaw.net>; Tara Swafford <tara@swaffordlawfirm.com>
Subject: Re: Andrews v. Tri Star Discovery

Thanks Betsy. I trial set in the SD of AL, the Court kept moving deadlines around on us. Fortunately, that matter has been resolved. So I will be turning my attention back to this case.

Will you be in office tomorrow and available for a call?



Daniel Arciniegas

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From: Betsy Hart <betsy@swaffordlawfirm.com>

Date: Tuesday, February 8, 2022 at 11:36 AM

To: Daniel Arciniegas <daniel@attorneydaniel.com>

Cc: Roland Mumford <roland@mumfordlaw.net>, Tara Swafford <tara@swaffordlawfirm.com>

Subject: Andrews v. Tri Star Discovery

Daniel,

The .msg documents that were previously produced have been converted to PDFs. Those are attached with new bates numbers.

We still have not received your client's subsequent wage and income information that you indicated would be produced by January 28. What is the status of that?

I have attached a revised proposed protective order that does not include a highly confidential designation since, at this time, we do not plan to produce any documents that would fall into that category. By entering into the attached protective order, Tri Star is not waiving its right to move for a new or amended protective order that would include a highly confidential designation in the event it becomes necessary to produce documents that should be designated at highly confidential and warrant greater protection. The proposed order includes your requested changes that counsel can retain copies of all documents for a year after appeal deadlines, and that the designating party is the one that should move for protection if there's a dispute. Please let me know if you can agree to this version of the protective order, with the understanding that Tri Star retains its right to move for a new or amended order down the road if necessary, so that we can keep discovery moving.

Please give me or Tara a call if you would like to discuss. Thanks.



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